

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA

(1) CAMEO HOLLAND, an Individual)
and Next of Kin to Minor Child, S.R.,)
Deceased,)

Plaintiff,)

vs.)

Case No. CIV-21-275-J

(1) CITY OF OKLAHOMA CITY,)
(2) WADE GOURLEY, individually,)
(3) COREY ADAMS, individually,)
(4) JARED BARTON, individually,)
(5) BRAD PEMBERTON, individually,)
(6) BETHANY SEARS, individually,)
(7) JOHN SKUTA, individually,)

Defendants.)

MOTION AND BRIEF TO WITHDRAW AS COUNSEL OF RECORD

Ambre C. Gooch of the law firm of Collins, Zorn & Wagner, P.C., counsel of record for Defendants Jared Barton, individually, Brad Pemberton, individually, and Bethany Sears, individually, in the above-referenced matter respectfully requests that the Court grant her permission to withdraw as counsel of record for Defendants Jared Barton, Brad Pemberton and Bethany Sears because she will soon be leaving private practice. Chris Collins and Stacey Haws Felkner have each entered their appearances in this matter (Docs. 14, 16, 21, 23) and they will continue to represent Defendants Jared Barton, Brad Pemberton and Bethany Sears in this matter.

As such, the undersigned respectfully requests that this Court enter an Order allowing her to withdraw as attorney of record for Defendants Jared Barton, individually,

Brad Pemberton, individually, and Bethany Sears, individually. A proposed Order is being submitted with this Motion.

Respectfully submitted,

s/ Ambre C. Gooch
Ambre C. Gooch, OBA No. 16586
COLLINS, ZORN & WAGNER, P.C.
429 N.E. 50th Street, 2nd Floor
Oklahoma City, OK 73105-1815
Telephone: (405) 524-2070
E-mail: acg@czwlaw.com

ATTORNEY FOR DEFENDANTS
JARED BARTON, individually,
BRAD PEMBERTON, individually, and
BETHANY SEARS, individually

CERTIFICATE OF SERVICE

I hereby certify that on August 13, 2021, I electronically transmitted this filing to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrant:

Rand C. Eddy, email at: rand@lawokc.com
MULINIX EDDY EWERT & MCKENZIE, PLLC
Oklahoma Tower
210 Park Avenue, Suite 3030
Oklahoma City, OK 73102
Attorney for Plaintiff

Richard N. Mann, email at: Richard.mann@okc.gov
Katie Goff, email at: Katie.goff@okc.gov
Assistant Municipal Counselor
City of Oklahoma City
200 N. Walker Avenue, Suite 400
Oklahoma City OK 73102
*Attorneys for Defendants City of Oklahoma City
and Wade Gourley*

Scott B. Wood, email at: okcoplaw@aol.com

WOOD, PUHL & WOOD, P.L.L.C.

2409 E. Skelly Drive, Suite 200

Tulsa, OK 74105

Attorney for Defendant Jonathan Skuta

Gary J. James, email at: gary@garyjameslaw.com

GARY J. JAMES & ASSOCIATES, P.C.

P.O. Box 2443

Oklahoma City, OK 73101

Attorney for Defendant Corey Adams

s/ Ambre C. Gooch

Ambre C. Gooch